

WARRANT NUMBER: _____

AFFIDAVIT FOR SEARCH WARRANT

THE STATE OF TEXAS
COUNTY OF HARRIS

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The undersigned Affiant, [REDACTED], being a Peace Officer under the laws of Texas, and being duly sworn, on oath makes the following statements and accusations:

1. THERE IS IN HARRIS COUNTY, TEXAS A SUSPECTED PLACE AND PREMISES DESCRIBED AND LOCATED AS FOLLOWS:

The Chancery of the Archdiocese of Galveston and Houston ("The Chancery" and/or "Archdiocese"), (1) **The Chancery of the Archdiocese of Galveston-Houston**, the local business office of the area Catholic Church, located at 1700 San Jacinto St, Houston, Harris County, TX 77002, which is a white four-story office building, housing the offices of the local Cardinal and Archdiocese staff with signage reading, "The Chancery of the Archdiocese of Galveston-Houston"; (2) **The Cathedral Center**, an event venue operated by the Archdiocese of Galveston and Houston, located at 1701 San Jacinto St, Houston, Harris County, TX 77002, which is a gray building with signage reading, "Cathedral Center," and a large Christian cross; (3) **The Co-Cathedral of the Sacred Heart**, a place of worship for the Archdiocese of Galveston-Houston, located at 1111 St Joseph Pkwy, Houston, Harris County, TX 77002, which is a large gray church with exterior signage reading, "Co-Cathedral of the Sacred Heart"; and (4) **the Co-Cathedral of the Sacred Heart Old Building known as The Gabriel Project**, a former place of worship for the Archdiocese of Galveston-Houston, located at 1111 Pierce St, Houston, Harris County, TX 77002, which is a large brown and tan stone church with masonry statues and signage reading, "The Gabriel Project"; ("the four identified locations known collectively as "the premises"); including specifically, but, not limited to the locations as required by the Canon Laws for the Catholic Church, entitled, "*Title III – Internal Ordering of Particular Churches – Chapter II- The Diocesan Curia, Article 2 – The Chancellor, Other Notaries and the Archives*" ("Canon Laws"), such as: "a secret archive in the diocesan curia or safe or file in the ordinary archive, completely closed and locked which cannot be removed from the place, and in which documents to be kept secret are to be protected most securely," as identified in Canon 489, in the Code of Canon Law; as well as in the "curia, a safe place a diocesan archive or store-room in which instruments and writings which refer to both the spiritual and temporal affairs of the diocese, properly arranged and diligently secured and safeguarded" as identified in Canon 486, in the Code of Canon Law; as well as such other places which may reasonably reposit or secrete such as items, documents, or objects identified in the search warrant, to include all other buildings, structures, places on said premises, and within the curtilage of said premises, vehicles located on the curtilage or parking area designated for said premises.

2. SAID SUSPECTED PLACE AND PREMISES ARE IN CHARGE OF AND CONTROLLED BY EACH OF THE FOLLOWING PERSONS:

The Archdiocese of Galveston-Houston
Cardinal Daniel DiNardo, and/or
Auxiliary Bishop George Sheltz

3. IT IS THE BELIEF OF AFFIANT THAT A SPECIFIC CRIMINAL OFFENSE HAS BEEN COMMITTED, TO-WIT:

That the defendant, Manuel La Rosa-Lopez, on or about April 9, 2000, in Montgomery County, Texas, did then and there, commit the offense of Indecency with a Child by Contact, a Second Degree Felony, Texas Penal Code, Sec. 21.11, with the intent to arouse and gratify the sexual desire of Manuel La Rosa-Lopez, by touching the genitals of M.V., a child younger than seventeen years of age, with Manuel La Rosa-Lopez's sexual organ, and/or by touching the breast of M.V. with the defendant's hand.

The defendant, Manuel La Rosa-Lopez, on or about October 5, 2000, in Montgomery County, Texas, did then and there, commit the offense of Indecency with a Child by Contact, a Second Degree Felony, Texas Penal Code, Sec. 21.11, with the intent to arouse and gratify the sexual desire of Manuel La Rosa-Lopez, by touching the anus and/or genitals of J.H., a child younger than seventeen years of age, with Manuel La Rosa-Lopez's hand.

4. THERE IS AT SAID SUSPECTED PLACE AND PREMISES PROPERTY AND ITEMS CONCEALED AND KEPT CONSTITUTING EVIDENCE OF SAID OFFENSE AND CONSTITUTING EVIDENCE THAT A PARTICULAR PERSON COMMITTED SAID OFFENSE, DESCRIBED AS FOLLOWS:

(a) All records and documents pertaining to Manuel La Rosa-Lopez, from any church, facility, or treatment center, connected to or associated with or utilized by the Catholic Church or the Archdiocese of Galveston-Houston, including, but, not limited to whether such documents relate to employment, student, client, or otherwise, concerning: counseling or therapy records, assessments, interviews, psychological or physiological tests, written notes, narratives, memorandums, evaluations, progress reports, curriculum, addiction profile, activity log, lecture material, attendance records, investigations, letters or communications regarding the individual, discipline inquiries and/or discipline actions, reassignments, referrals or requests for counseling services, employment records, or any record or document relating to complaints, grievances, or concerns made by any person relating to the defendant's inappropriate sexual conduct, sexual contact, and/or sexual innuendos or misconduct, or being uncomfortable around the defendant.

(b) Electronics and/or photos and/or images, documents and/or documentation, and electronic devices, including, but, not limited to: electronic computers, or electronic devices capable of saving or storing electronic copies of said documents, still images and motion images, video, electronic recordings, and electronic devices used to capture or store digital electronic or analog data or images. Any device capable of processing or manipulating digital data or images, any and all computer systems and software used to operate such systems, hard drives, related hardware, software and programs used to communicate with other computer terminals via telephone or other means or to encrypt computer stored data or to manage or convert computer stored data or manage electronic data, to computer electronic files, and any cords, power plugs, electronic storage devices, CD's, flash drives, hard drives, external hard drives, or other electronic devices such as cell phones, tablets, laptops, computer hard drives (including power cords necessary to operate such devices); as well as servers, wherever they may be located, designed or utilized in maintaining and storing data or images

from network drives or individual computers connected to said server, as a means of backing up, storing, or securing electronic data or images from electronic devices utilized on "the premises;" or documentation which identifies the back-up sources, servers and/or their locations.

Documentation or Electronics, as described in paragraph (b), which may contain hard copy or electronic evidence reflecting billing, invoices, payments, bank statements, checks, appointments, or consultations made for counseling and/or therapy services for Manuel La Rosa-Lopez, including treatment for sexual misconduct and/or rehabilitation; or for any other person, including, but, not limited to M.V. and/or J.H., and/or other potential victims of Manuel La Rosa-Lopez, resulting from allegations relating to sexual misconduct. This specifically includes the identity of the therapists and/or counselors who provided the services and/or consultations along with any reports, notes, letters, or opinions issued by the therapist and/or counselor(s), and/or documents regarding the investigation of allegations made against Manuel La Rosa-Lopez, and/or documents regarding the investigation of allegations made by M.V. and/or J.H.

To specifically search for documentation or documents reflecting assignment(s) of the Manuel La Rosa-Lopez, photographs, journals (whether personal or as required as part of his duties as a priest or for purposes of therapy); correspondence, notes, personal writings, in any format, hard copy or electronic, relating to allegations of sexual misconduct involving M.V. and/or J.H. and/or any other person who may be a victim of the Manuel La Rosa-Lopez.

(c) Any items leading to the identification of other potential victims, or other priests who there is probable cause to believe may have been involved in a crime, as may be identified while conducting the search for documents involving the defendant.

(d) All such documents described in paragraphs (a) through (d) being located in normal filing locations; and as noted in the Code of Canon Law, all "diocesan and parochial documents protected with the greatest of care, in every curia, the established safe place a diocesan archive or store-room in which the instruments and writings which refer to both the spiritual and temporal affairs of the diocese, arranged and secured, and safeguarded" (as described in Canon 486); "summaries, synopses, and/or inventories or catalog of the documents contained in the archive, or a brief synopsis of the contents of each one of the items in the diocesan archive or store-room contents" (as described in Canon 486); and in addition, the "secret archive in the diocesan curia or at least a safe or file in the ordinary archive, completely closed and locked which cannot be removed from the place, and in which documents to be kept secret are to be protected most securely; including a brief summary of the case with the text of the definitive sentence to be retained for those documents which every year documents of criminal cases are to be destroyed in matters of morals in which the criminal has died or in which ten years have passed since the condemnatory sentence" (as described in Canon 489); "the inventory of the diocesan curia secret archive" (as described in Canon 489); and/or the "summary of destroyed documents from diocesan curia secret archive" (as described in Canon 489).

(e) Any such evidence which relates to the offense of Indecency with a Child as may be discovered during the course of this search warrant.

5. AFFIANT HAS PROBABLE CAUSE FOR SAID BELIEF BY REASON OF THE FOLLOWING FACTS:

Affiant is Detective Joe McGrew, a Master Peace Officer certified by the State of Texas and currently employed by the Conroe Police Department, with eight years of service as a peace officer, a Bachelor's Degree in Criminal Justice, and a Master's Degree in Criminology. Affiant is presently assigned to a specialized division, Special Victims Unit – Crimes Against Children. Based on his investigation and review of Offense Report Numbers 18081060 and 18081147, Affiant has determined the following facts:

On 08/27/18, report 18081060 was filed by J.H., an adult who reported being sexually abused while he was a child under the age of seventeen. In the report, J.H. states that during 1998 through 2000 he was a "Sacristan" at the Sacred Heart Catholic Church, under Father Manuel La Rosa-Lopez. J.H. stated that all during his time as "Sacristan", Manuel La Rosa-Lopez began touching him and making intimate gestures, which increased in frequency and severity. These gestures culminated on or before 10/05/00 when Manuel La Rosa-Lopez called J.H. into the sacristy to move some items from the offices to La Rosa's living quarters. Once in the living quarters, Manuel La Rosa-Lopez showed photographs to J.H. which depicted partially-naked men from Manuel La Rosa-Lopez's seminary. Manuel La Rosa-Lopez sat J.H. on the bed for this. J.H. attempted to leave when he saw the photos, but Manuel La Rosa-Lopez physically prohibited him from leaving. Manuel La Rosa-Lopez then began "fingering" J.H. Manuel La Rosa-Lopez unbuttoned J.H.'s pants, reached inside J.H.'s pants and fondled J.H.'s penis and anus with Manuel La Rosa-Lopez's hands and fingers. The incident ended when J.H.'s sister arrived to pick him up and blew her car horn in the parking lot, Manuel La Rosa-Lopez allowed J.H. to leave. J.H. stated that he was still under the age of seventeen when this incident occurred. Sacred Heart Catholic Church is known by Affiant to be within the jurisdictional limits of Conroe, Montgomery County, Texas.

J.H. stated that the immediate motivation for his report is the continuing news coverage of the Catholic Priest Sex Scandal. J.H. stated that about one year ago he contacted his local parish, who put him into contact with the Galveston-Houston Archdiocese Victims Assistance Coordinator. He stated that the coordinator is Sister Maureen O'Connell. This led to J.H. being flown from his current residence out of state to Houston and his being interviewed by Sister O'Connell and Cardinal DiNardo. This meeting occurred on 08/08/18. This interview occurred at the Archdiocese. Therefore, it is believed that paperwork probably exists relating to this meeting in the office of Maureen O'Connell and/or the office of Cardinal DiNardo. As a result of this meeting, the church offered to provide J.H. with psychological counseling services. The church continues to be in contact with J.H. regarding their investigation. J.H. stated that Sister O'Connell told him that reports had been filed with Conroe Police Department and Child Protective Services. CPS closed their investigations at intake, as the alleged perpetrator did not have current contact with the victims, and the victims are no longer children.

Affiant asked J.H. if he was aware of any other possible victims. J.H. identified his successor as a "Sacristan" as J.H.2. He also identified another family, "LAA".

On 08/29/18, report 18081147 was filed by M.V., an adult who reported being sexually abused as a child while under the age of seventeen. M.V. stated that in 2001 she was attending Sacred Heart Catholic Church, located in Conroe, Montgomery County, Texas. She stated that at that time, Father Manuel La Rosa-Lopez was her confessor. M.V. stated that early in the year Manuel La Rosa-Lopez began what she described as "grooming behavior". M.V. stated this was terminology used by her therapist. She stated that the behavior consisted of heavy-petting and kissing. This behavior culminated on or about 04/09/2000 when, after a confession in his office, Manuel La Rosa-Lopez took off his white collar and began kissing M.V. and pressing his erect penis into her "crotch." (clarified to mean her sexual organ). At that time Manuel La Rosa-Lopez told her, "I have to wait until you're 16, because I'm trying to [REDACTED] you." Then, on or about 04/11/2001, following a practice for a Passion of the Christ play, M.V. and Manuel La Rosa-Lopez were alone in the church kitchen. M.V. stated that M.V. began fondling her, and reached underneath her shirt and her bra to touch her breasts with his hands.

M.V. stated that she recorded her interactions with La Rosa in her diary. She used the code name "Felipe" to refer to him. M.V. stated that her father had been reading her diary, and was investigating who Felipe could be. Her father determined that Felipe was in fact Manuel La Rosa-Lopez and confronted M.V. about it, then made a report to the church. This report resulted in visits from the head priest, Father Dave Kennedy (now deceased) and then-Bishop Joseph Fiornza, with the Archdiocese of Galveston-Houston. The result of these meetings is that Manuel La Rosa-Lopez was transferred away from Sacred Heart, and M.V.'s father told M.V. to never to speak of it again. Several months later M.V.'s whole family moved to Israel.

In 2010, M.V. had returned to Conroe, TX, and was married. M.V. stated that she observed in a Catholic newspaper that Manuel La Rosa-Lopez had received a promotion, and was in fact assigned his own church in Richmond, TX. This motivated M.V. to follow up with the Catholic Church, and she contacted the Archdiocese of Galveston-Houston, which put her into contact with Sister Maureen O'Connell. M.V. was interviewed by Sister O'Connell and Cardinal DiNardo. This interview occurred at the Archdiocese in Houston. Therefore, it is believed that paperwork probably exists relating to this meeting in the office of Maureen O'Connell and/or the office of Cardinal DiNardo. M.V. was advised that Manuel La Rosa-Lopez had been sent to a mental institution and was then placed in an administrative position from which he had no contact with children or teenagers. Affiant has verified through the Archdiocese of Galveston-Houston website that Manuel La Rosa-Lopez is the Priest of St. John Fisher Church in Richmond, TX. Affiant learned that St. John Fisher Church is located at 410 Clay St., Fort Bend County, Richmond, TX 77469.

M.V. stated that she decided to make a police report because of the perceived duplicity of Cardinal DiNardo (regarding his public statements regarding recent priest sex scandals) and the church's failure to adequately protect children from Manuel La Rosa-Lopez.

Affiant asked M.V. about the identity of any other potential victims of Manuel La Rosa-Lopez. M.V. identified another boy who was the "Sacristan" at Sacred Heart at the same time Manuel La Rosa-Lopez was her confessor. She stated that the boy spent a lot of time with Manuel La Rosa-Lopez, then identified him by name as J.H.2. She further identified the boys of the "LAA" family.

Affiant investigated any ties between M.V. and J.H. through thorough social media searches and questioning and has determined no link between M.V. and J.H. Both M.V. and J.H. independently cite the current media attention regarding the indictments of priests in Pennsylvania as partial motivators for coming forward at this time.

On September 11, 2018, Affiant went to St. John Fisher Church located at 410 Clay St., Fort Bend County, Richmond, TX 77469. Affiant observed that St. John the Fisher Church is a complex consisting of a white colored chapel building, a brown administration building, and a white brick single-family-style dwelling being used as a residence, identified by brick signage, "St. John Fisher" in various states of disrepair. Affiant learned from a maintenance worker at St. John Fisher Church that Manuel La Rosa-Lopez uses the white brick single-family-style dwelling located on the complex as a residence. Affiant spoke with Frank Barlow Rynd from the Archdiocese of Galveston-Houston. Frank Barlow Rynd stated that Manuel La Rosa-Lopez has been with St. John Fisher Church for 15 years.

J.H. and M.V. have stated during Affiant's investigation that they have reported the offenses to the Catholic Church, specifically the Archdiocese of Galveston-Houston, and that an investigation has been conducted within the Catholic Church. Both J.H. and M.V. have stated during Affiant's investigation that church officials have offered and/or provided therapy and counseling services as a result of the church investigations. M.V. has stated that as a result of the initial report of the offense against her in 2000, Manuel La Rosa-Lopez was transferred away from the parish (Sacred Heart Church, Conroe, TX) in which the offenses took place. J.H. and M.V. have stated that they were informed by Archdiocese officials that Manuel La Rosa-Lopez was sent for mental health evaluation and treatment as a result of the church investigations. Affiant believes this is sufficient evidence to believe that church documents exist within property owned and/or operated by the Archdiocese which regards the offenses of Manuel La Rosa-Lopez against both victims. Affiant believes that there would be notes, recommendations, impressions, or any resulting action or investigation taken during or as a result of those meetings between the complainants and Sister O'Connell and Cardinal DiNardo and that such documentation would be located in the possession and under the care of Sister O'Connell or Cardinal DiNardo in their respective offices located on the premises of the Archdiocese of Galveston-Houston and/or in storage on the Premises, as identified in paragraph 1 above.

On September 12, 2018, Affiant executed a search warrant on the parish and residence of Manuel La Rosa-Lopez at 410 Clay St., Fort Bend County, Richmond, TX 77469. Affiant found documentation in the residence indicating that Manuel La Rosa-Lopez received services from Shalom Center located at 13516 Morgan Dr., Splendora, Texas 77372 from at approximately April 16, 2001 to approximately January 3, 2002. This supports what Sister O'Connell and Cardinal DiNardo told M.V. about Manuel La Rosa-Lopez having been sent to a mental institution. Documents contained in a folder labeled "Shalom Center, Inc... Manuel La Rosa, II-C, April 16, 2001" that was found in Manuel La Rosa-Lopez's bedroom refer to the sexual abuse allegations described above. These documents contain Shalom Center counseling material, and specifically reference M.V. by name. Documents recovered in the search warrant on the defendant's home clearly indicate that there was, and probably remains, correspondence between the defendant and the Archdiocese of Galveston-Houston.

Further, records in the documentation provided by the attorneys representing the Archdiocese show

that correspondence between the Archdiocese and the "Holy See of Rome" concerning the defendant's Board Review and whether the defendant's "priestly services" would be re-instated. A "moral opinion" was sought from the Holy See relating to whether a Canon Law was violated during the confessional. Affiant has learned through several individuals, including from the attorney for the Archdiocese of Galveston-Houston, that there is not a retention policy concerning documents relating to sexual abuse investigations and that these documents would be maintained on the premises of the Archdiocese of Galveston-Houston. This practice is consistent with the Canon Laws described above in 4(d), requiring retention of certain documents, an inventory of those documents to be maintained, or if ever destroyed, requiring a summary of the contents of the destroyed documents. Because of the voluminous nature of the records and documents said to be maintained and as are required to be maintained by the Canon Laws of the Catholic Church, Affiant believes it is reasonable to anticipate that all of the buildings located on the premises described in paragraph 1, may contain storage of documents and records sought in this warrant and have requested to search all buildings identified in paragraph 1, collectively referred to as The Chancery or the Premises.

Interviews conducted by the Affiant confirmed the Chancery's practice to not destroy documents. On September 17, 2018, a search warrant was conducted at the Sacred Heart Parish located in Conroe, Texas. Upon our arrival, Eileen Borski, the Parish Administrator, indicated that the facility may have a few documents, but, that the majority of their documents are maintained in the possession of the Archdiocese of Galveston-Houston. In particular, that the records relating to Father La Rosa-Lopez were so long ago, that the majority of records, whether personnel or otherwise, relating to Father La Rosa-Lopez would be located in the possession of the Archdiocese of Galveston-Houston.

Also, on September 19, 2018 date, Daniel A. Kidd and Dr. Patricia Reed were interviewed at The Shalom Center, 13516 Morgan Drive, Splendora, TX and stated that the facility may have some of the documents for which we were searching, but, that the Archdiocese in Galveston-Houston would be the place that maintains all of the records. While Dr. Reed initially was unsure about the archdiocese retention policy and thought it might be ten years, she corrected herself through counsel confirming no retention policy for the Archdiocese. Affiant is also aware through experience and training that these records are kept by facilities both on paper, and electronically, including CDs, USBs, hard drives, external hard drives, or other such devices which store and/or retain electronic data information, or may be backed-up on a server, cloud, or other service utilized to store and secure electronic images. In addition, Affiant has learned that each priest is required to make a hand-written daily journal of the events at the parish. According to the canons, Affiant believes that the journal is not something that would be destroyed, but, rather retained. The journal of the defendant has not been located at any location already searched by Affiant. Therefore, Affiant has a reasonable belief that this journal may be housed at the Archdiocese.

In addition, several of the documents recovered during the search warrant of the Shalom Center discuss that the defendant's role within the church was reviewed or considered by the Archdiocese Galveston-Houston, in the form of a panel, board or committee ("review board"). It appears that the purpose of the "review board" was to consider whether the defendant should be re-activated or placed "back in service" as a priest, be assigned to a parish as the priest for a parish, or maintain his current role within the church or be re-assigned in either another role or facility. It is clear from several documents that the panel, board, or committee determined that the defendant should be placed back in service and was assigned to the St. John Fisher Church, located in Richmond, Texas.

However, the documentation seized to date only references that the panel, board or committee reviewed the defendant's specific circumstances and reached their decision. The attorney for the Archdiocese has provided, pursuant to a grand jury subpoena, some documentation relating to the review board. Affiant believes that documents would exist relating to the composition of the review board, memorandums of the meetings, agendas for the meetings, notes from the meetings, as well as the minutes of the meetings.

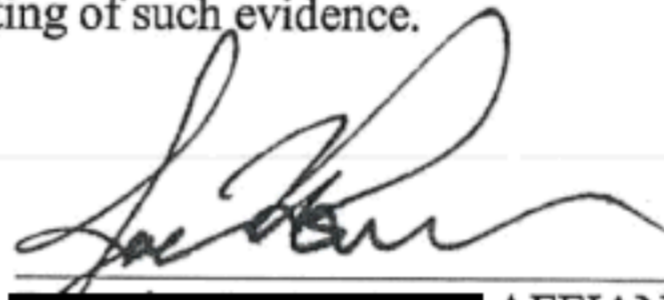
An additional individual, A.C., has come forward stating that LaRosa had touched him years back when the defendant was at St. Thomas More Catholic Church. Affiant also believes that the Archdiocese of Galveston-Houston is in possession of documentation relating to this complainant as well. So far, only two documents have been provided relating to A.C.'s investigation. This is an investigation relating to improper contact between the defendant and a sixth grade boy. Based on the Affiant's training and experience, such an investigation would generate more paper than 2-3 pages. Documents provided by the attorneys for the Archdiocese discuss an "investigation" into the allegation of A.C. In a letter dated October 9, 1992, by an attorney hired to conduct an investigation whether the church was required to notify CPS of the complaint, there are several references to meetings, phone conversations, as well as a recommendation for additional spiritual and psychological evaluations be conducted before being allowed to continue with his seminarian studies. To date, no psychological evaluations from 1992 have been discovered. The recommendation was made to Rev. Joseph A. Fiorenza of the Diocese of Galveston-Houston, so it is reasonable to believe that documents exist relating to the investigation of the complaints by A.C. Moreover, in a letter dated October 12, 1992, Rev. Fiorenza, Bishop of the Galveston-Houston Diocese, writes a letter back to the attorney conducting the investigation and notes that an additional 'psychological examination will be conducted before admittance into the seminary.' LaRosa was admitted into the seminary Spring 1993. Therefore, it is reasonable to believe that a psychological exam should exist from that time frame and be kept at the premises of the Archdiocese of Galveston-Houston.

Affiant also believes that the record retention policy of the Archdiocese of Galveston-Houston, as well as the Canon Law requirements to maintain records, it is probable and reasonable to believe that records may also exist in electronic form, stored on servers, hard drives, or other electronic storage devices, as well as back-up services, such as a "cloud" or other back-up storage device utilized to preserve electronic images, documents or records. Affiant has spoken with experts in the field of forensic computer examinations. Because of the large volume of information stored on a computer, it is almost always necessary to examine the computer off-site. More often than not, a qualified investigator will do a forensically sound analysis on the computer at the scene; however, a comprehensive forensic examination of a computer may take days or even months. Affiant has also learned that experts in the field of computer forensics are able to recover data that has been deleted from a computer hard drive, as well as storage media (floppy disks, compact discs, Zip drives, Pen drives, Thumb drives, tapes, etc.). Affiant also knows from training and experience that digital material has the capability of remaining on devices designed to store them for an indefinite period of time including weeks, months, and years. Affiant also knows from training and experience, that it is possible to retrieve items that have been deleted by the user through the use of a forensic recovery on the storage device, server, or electronic device.


Based on Affiant's training and experience, Affiant knows that in order to completely and accurately retrieve data maintained in computer hardware or on computer software, to ensure accuracy and completeness of such data, and to prevent the loss of the data either from accidental or programmed destruction, it is often necessary that computer hard drives be copied and examined by a qualified computer specialist.

Based on the factors listed above, Affiant is respectfully requesting that he be allowed to search "said premises" listed in paragraph one, for the items listed in paragraph four and seize the same.

WHEREFORE, Affiant seeks for issuance of a warrant that will authorize him to search said suspected place and premises for said property and seize the same and that any property seized pursuant to this search warrant, such peace officer is hereby ordered and authorized to transport said evidence across county lines to be stored and placed in evidence and/or processed and transported as necessary for forensic analysis or testing of such evidence.


[REDACTED] AFFIANT

SUBSCRIBED and SWORN to before me by said Affiant on this the 28th day of November, 2018.


HONORABLE Brad Hart
230 TH DISTRICT COURT
HARRIS COUNTY, TEXAS
Brad Hart
PRINTED NAME OF JUDGE

WARRANT NUMBER: _____

SEARCH WARRANT

THE STATE OF TEXAS
COUNTY OF HARRIS

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THE STATE OF TEXAS to the Sheriff or any Peace Officer of Montgomery County, Harris County, Texas, or any Peace Officer of the State of Texas,

GREETINGS:

WHEREAS, the Affiant whose signature is affixed to the attached Affidavit is a Peace Officer under the laws of Texas and did heretofore this day subscribe and swear to said Affidavit before me (which said affidavit is by this reference incorporated herein for all purposes), and whereas I find that he verified facts stated by Affiant in said Affidavit show that Affiant has probable cause for the belief he expresses therein and establishes the existence of proper grounds for the issuance of this Warrant.

NOW, THEREFORE, you are commanded to search the suspected place and premises:

The Chancery of the Archdiocese of Galveston and Houston ("The Chancery" and/or "Archdiocese"), (1) **The Chancery of the Archdiocese of Galveston-Houston**, the local business office of the area Catholic Church, located at 1700 San Jacinto St, Houston, Harris County, TX 77002, which is a white four-story office building, housing the offices of the local Cardinal and Archdiocese staff with signage reading, "The Chancery of the Archdiocese of Galveston-Houston"; (2) **The Cathedral Center**, an event venue operated by the Archdiocese of Galveston and Houston, located at 1701 San Jacinto St, Houston, Harris County, TX 77002, which is a gray building with signage reading, "Cathedral Center," and a large Christian cross; (3) **The Co-Cathedral of the Sacred Heart**, a place of worship for the Archdiocese of Galveston-Houston, located at 1111 St Joseph Pkwy, Houston, Harris County, TX 77002, which is a large gray church with exterior signage reading, "Co-Cathedral of the Sacred Heart"; and (4) **the Co-Cathedral of the Sacred Heart Old Building known as The Gabriel Project**, a former place of worship for the Archdiocese of Galveston-Houston, located at 1111 Pierce St, Houston, Harris County, TX 77002, which is a large brown and tan stone church with masonry statues and signage reading, "**The Gabriel Project**"; ("the four identified locations known collectively as "the premises"); including specifically, but, not limited to the locations as required by the Canon Laws for the Catholic Church, entitled, "*Title III – Internal Ordering of Particular Churches – Chapter II- The Diocesan Curia, Article 2 – The Chancellor, Other Notaries and the Archives*" ("Canon Laws"), such as: "a secret archive in the diocesan curia or safe or file in the ordinary archive, completely closed and locked which cannot be removed from the place, and in which documents to be kept secret are to be protected most securely," as identified in Canon 489, in the Code of Canon Law; as well as in the "curia, a safe place a diocesan archive or store-room in which instruments and writings which refer to both the spiritual and temporal affairs of the diocese, properly arranged and diligently secured and safeguarded" as identified in Canon 486, in the Code of Canon Law; as well as such other places

which may reasonably reposit or secrete such as items, documents, or objects identified in the search warrant, to include all other buildings, structures, places on said premises, and within the curtilage of said premises, vehicles located on the curtilage or parking area designated for said premises.

You are commanded to search and seize the property and items described in said affidavit, to-wit:

(a) All records and documents pertaining to Manuel La Rosa-Lopez, from any church, facility, or treatment center, connected to or associated with or utilized by the Catholic Church or the Archdiocese of Galveston-Houston, including, but, not limited to whether such documents relate to employment, student, client, or otherwise, concerning: counseling or therapy records, assessments, interviews, psychological or physiological tests, written notes, narratives, memorandums, evaluations, progress reports, curriculum, addiction profile, activity log, lecture material, attendance records, investigations, letters or communications regarding the individual, discipline inquiries and/or discipline actions, reassignments, referrals or requests for counseling services, employment records, or any record or document relating to complaints, grievances, or concerns made by any person relating to the defendant's inappropriate sexual conduct, sexual contact, and/or sexual innuendos or misconduct, or being uncomfortable around the defendant.

(b) Electronics and/or photos and/or images, documents and/or documentation, and electronic devices, including, but, not limited to: electronic computers, or electronic devices capable of saving or storing electronic copies of said documents, still images and motion images, video, electronic recordings, and electronic devices used to capture or store digital electronic or analog data or images. Any device capable of processing or manipulating digital data or images, any and all computer systems and software used to operate such systems, hard drives, related hardware, software and programs used to communicate with other computer terminals via telephone or other means or to encrypt computer stored data or to manage or convert computer stored data or manage electronic data, to computer electronic files, and any cords, power plugs, electronic storage devices, CD's, flash drives, hard drives, external hard drives, or other electronic devices such as cell phones, tablets, laptops, computer hard drives (including power cords necessary to operate such devices); as well as servers, wherever they may be located, designed or utilized in maintaining and storing data or images from network drives or individual computers connected to said server, as a means of backing up, storing, or securing electronic data or images from electronic devices utilized on "the premises;" or documentation which identifies the back-up sources, servers and/or their locations.

Documentation or Electronics, as described in paragraph (b), which may contain hard copy or electronic evidence reflecting billing, invoices, payments, bank statements, checks, appointments, or consultations made for counseling and/or therapy services for Manuel La Rosa-Lopez, including treatment for sexual misconduct and/or rehabilitation; or for any other person, including, but, not limited to M.V. and/or J.H., and/or other potential victims of Manuel La Rosa-Lopez, resulting from allegations relating to sexual misconduct. This specifically includes the identity of the therapists and/or counselors who provided the services and/or consultations along with any reports, notes, letters, or opinions issued by the therapist and/or counselor(s), and/or documents regarding the investigation of allegations made against Manuel La Rosa-Lopez, and/or documents regarding the investigation of allegations made by M.V. and/or J.H.

To specifically search for documentation or documents reflecting assignment(s) of the Manuel La Rosa-Lopez, photographs, journals (whether personal or as required as part of his duties as a priest or for purposes of therapy); correspondence, notes, personal writings, in any format, hard copy or electronic, relating to allegations of sexual misconduct involving M.V. and/or J.H. and/or any other person who may be a victim of the Manuel La Rosa-Lopez.

(c) Any items leading to the identification of other potential victims, or other priests who there is probable cause to believe may have been involved in a crime, as may be identified while conducting the search for documents involving the defendant.

(d) All such documents described in paragraphs (a) through (d) being located in normal filing locations; and as noted in the Code of Canon Law, all "diocesan and parochial documents protected with the greatest of care, in every curia, the established safe place a diocesan archive or store-room in which the instruments and writings which refer to both the spiritual and temporal affairs of the diocese, arranged and secured, and safeguarded" (as described in Canon 486); "summaries, synopses, and/or inventories or catalog of the documents contained in the archive, or a brief synopsis of the contents of each one of the items in the diocesan archive or store-room contents" (as described in Canon 486); and in addition, the "secret archive in the diocesan curia or at least a safe or file in the ordinary archive, completely closed and locked which cannot be removed from the place, and in which documents to be kept secret are to be protected most securely; including a brief summary of the case with the text of the definitive sentence to be retained for those documents which every year documents of criminal cases are to be destroyed in matters of morals in which the criminal has died or in which ten years have passed since the condemnatory sentence" (as described in Canon 489); "the inventory of the diocesan curia secret archive" (as described in Canon 489); and/or the "summary of destroyed documents from diocesan curia secret archive" (as described in Canon 489).

(e) Any such evidence which relates to the offense of Indecency with a Child as may be discovered during the course of this search warrant.

You are commanded to seize the same and bring it before me. Herein fail not, but have you then and there this Warrant within three days exclusive of the day of its execution, with your return thereon, showing how you have executed the same and that any property seized pursuant to this search warrant, such peace officer is hereby ordered and authorized to transport said evidence across county lines to be stored and placed in evidence and/or processed and transported as necessary for forensic analysis or testing of such evidence.

ISSUED AT 8:48 o'clock A.M. on this the 28th day of November, 2018, to certify which witness my hand this day.

HONORABLE

230 TH DISTRICT COURT
HARRIS COUNTY, TEXAS

Brad Hart
PRINTED NAME OF JUDGE

